

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

IN RE: POLYURETHANE FOAM ANTITRUST
LITIGATION

MDL Docket No. 2196

Index No. 10-MD-2196(JZ)

This document relates to:

Hon. Jack Zouhary

DIRECT PURCHASER CLASS CASES

**STIPULATION FOR DISMISSAL, WITHOUT PREJUDICE, OF THE
PLAINTIFFS' CLAIMS AGAINST DEFENDANTS DOMFOAM AND VALLE FOAM**

In accordance with Rule 41 of the Federal Rules of Civil Procedure, Direct Purchaser Class Action Plaintiffs, individually and on behalf of an alleged class of entities that purchased Polyurethane Foam ("Plaintiffs"), and Defendants Domfoam International Inc. ("Domfoam") and Valle Foam Industries (1995) Inc. ("Valle Foam") stipulate and agree to the dismissal, without prejudice, of the Plaintiffs' claims against Defendants Domfoam and Valle Foam with each side bearing their own attorneys' fees and costs. The Plaintiffs and Defendants Domfoam and Valle Foam further stipulate and agree to this Court's continuing jurisdiction for purposes of enforcing the settlement between the Plaintiffs and Defendants Domfoam and Valle Foam. This Stipulation of dismissal, without prejudice, is intended to be without prejudice to the Plaintiffs' claims against any other Defendants or co-conspirators in the above-captioned case. A proposed Order of dismissal, without prejudice, accompanies this Stipulation as Exhibit 1.

Dated: March 27, 2012

Respectfully submitted,

PLAINTIFFS' INTERIM CO-LEAD COUNSEL,
on behalf of Class Plaintiffs individually and on
behalf of the Class

By: /s/ William A. Isaacson
William A. Isaacson
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Avenue, N.W., Suite 800
Washington, D.C. 20015
wisaacson@bsflp.com
Tel: (202) 237-2727
Fax: (202) 237-6131

By: /s/ Stephen Neuwirth
Stephen Neuwirth
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, New York 10010
stephennewirth@quinnemanuel.com
Tel: (212) 849-7000
Fax: (212) 849-7100

COUNSEL FOR DEFENDANTS DOMFOAM
INTERNATIONAL INC. AND VALLE FOAM
INDUSTRIES (1995) INC.

By: /s/ Shepard Goldfein
Shepard Goldfein
Elliot A. Silver
SKADDEN, ARPS, SLATE, MEAGHER
& FLOM, LLP
Four Times Square
New York, New York 10036
Tel: (212) 735-3000
Fax: (212) 735-2000
shepard.goldfein@skadden.com

CERTIFICATE OF SERVICE

I certify that on March 27, 2012, I caused a true and correct copy of the foregoing document to be filed and served electronically on counsel for the parties.

By: /s/ Melissa Willett